

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

EASTERN DIVISION

KIMBERLY S. LOPEZ,)	Honorable Matthew F. Kennelly
)	
<i>Plaintiff(s),</i>)	
)	
v.)	
)	No. 1:24-cv-13340
KUBALANZA, et al.,)	
)	
<i>Defendant(s).</i>)	
)	

PLAINTIFF'S OBJECTION TO STATE DEFENDANTS' MOTION FOR EXTENSION
OF TIME (DKT. 118)

Plaintiff Kimberly S. Lopez, *pro se*, respectfully submits this Objection to the State Defendants' Motion for Extension of Time to File a Reply in Support of their Motion to Dismiss (Dkt. 118), and states the following:

On April 4, 2025, counsel for the State Defendants contacted Plaintiff via email requesting the status of Plaintiff's response to their motion to dismiss and associated exhibits. This communication confirms that Defendants were aware of Plaintiff's filings, expected them, and had adequate time to prepare a reply.

On April 6, 2025, Plaintiff filed her consolidated opposition (Dkt. 112) in full compliance with the Court's April 9 deadline. Plaintiff simultaneously filed a Motion for Leave Instantly to Submit the Brief (Dkt. 111) and a Motion to Exceed Page Limits (Dkt. 111-1), pursuant to Local Rule 7.1.

Defendants now request an extension premised on the false assertion that it is "unclear" whether Dkt. 112 is Plaintiff's operative response. This is demonstrably incorrect. Plaintiff filed a Notice of Clarification and Procedural Compliance on April 8, 2025, confirming that Dkt. 112 is her controlling response and that Dkt. 100 is superseded.

Defendants' motion further alleges that Plaintiff introduced new arguments without authorization. However, Plaintiff's memorandum (Dkt. 112) was submitted before the deadline, in direct response to the Court's instructions, and with proper procedural motions. Defendants' tactical delay undermines judicial efficiency and mischaracterizes the record.

The State Defendants' claim of confusion is contradicted by their own prior conduct, including their April 4, 2025 email to Plaintiff, which anticipated her filing and requested access to the very materials they now claim surprised them.

Plaintiff does not oppose reasonable extensions based on genuine need, but objects to extensions premised on inaccurate procedural claims, misrepresentations to the Court, or efforts to dilute Plaintiff's timely and comprehensive filings.

WHEREFORE, Plaintiff respectfully Objects to the State Defendants' Motion for Extension (Dkt. 118) and requests that the Court deny the motion, or in the alternative, grant no

more than the original 7-day request to April 15, 2025, and disregard Defendants' mischaracterizations of Plaintiff's filings in any further proceedings.

Date: April 8, 2025

Respectfully submitted,

/s/ Kimberly S. Lopez

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